

EXHIBIT 11

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA EMAIL

April 22, 2016

Aisha E. Bembry, Esq.
Lewis Baach, PLLC
1899 Pennsylvania Ave., N.W.
Suite 600
Washington, DC 20006

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Aisha:

During the most recent meet-and-confer held on March 31, 2016, plaintiffs reiterated their long-standing concern that they have yet to receive a full, complete, and organized production of bank account records from the Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO"), as ordered by the Court on April 12, 2011. *See also* Plaintiffs' Executive Committees' letters dated March 14, 2014 (explaining that there are significant gaps in the defendants' document productions with respect to banking documents), and January 25, 2016 (expressing concern that the defendants have failed to produce a complete and organized set of banking records for many of the MWL and IIRO branch offices).

As an example, plaintiffs advised during the meeting that our independent investigative efforts have identified numerous bank accounts associated with the MWL and IIRO branch offices in Pakistan. For a majority of those accounts, plaintiffs have not received a single document. In other instances, the MWL and IIRO have produced a handful of bank statements (many of which are incomplete), but have otherwise failed to produce the entire range of relevant documentation logically associated with the account. As an example, the IIRO office in Peshawar, Pakistan had a bank account at Emirates Bank International which was frozen on September 13, 2001.¹ The IIRO has produced nineteen pages of account statements for Account No. 1166-577826-001 (IIRO025784-25803), but has yet to produce any other relevant records detailing the account's activities, including without limitation, account opening documents,

¹ Standard Chartered Bank (Pakistan) Limited took over Emirates Bank International in 2007.

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deposit and withdrawal slips, wire transfers, and communications with the bank relating to the freezing of the account and the disposition of the funds.

Plaintiffs submit that responsive documents for Account No. 1166-577826-001, and every MWL and IIRO bank account ordered produced by the Court, shall include but are not limited to: correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among the MWL and/or IIRO and the bank or financial institution; documents detailing the establishment of, freezing, and/or closing of the account(s); suspicious activity and/or transaction reports; monthly and annual account statements; account notices; deposit and withdrawal slips or receipts; check stubs; cleared or canceled checks; cashier checks; money orders; debit/credit memos; financial ledgers or journals; investment records; real estate records; records of assets; loan records; audit reports and audit work papers; wire transfers and client authorizations relating to same; and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

Per our agreement at the conclusion of the meet-and-confer, plaintiffs are providing you with the following list of accounts linked to the MWL and IIRO branch offices in Pakistan so that you may confer with your clients on this important discovery issue.

Muslim World League

Habib Bank, Civic Center, Islamabad, Pakistan	Account No: 50372-8
Habib Bank, Civic Center, Islamabad, Pakistan	97073-1
Habib Bank, Peshawar, Pakistan	17937
Habib Bank, Islamabad, Pakistan	9536-3
National Bank of Pakistan, Corporate Branch Islamabad	981-4
National Bank of Pakistan, Model Branch Islamabad	1521-9
National Bank of Pakistan, UN Plaza	2247
National Bank of Pakistan, UN Plaza	52152423
National Bank of Pakistan, UN Plaza	2448
National Bank of Pakistan, UN Plaza	4005
National Bank of Pakistan, UN Plaza	4185
National Bank of Pakistan, UN Plaza	52152462
National Bank of Pakistan, UN Plaza	52152552
National Bank of Pakistan, Wall St	52152039
Al Faysal Investment Bank Ltd, Islamabad	113-2034840-149

International Islamic Relief Organization

Habib Bank, Gilgit Branch, Pakistan	Account No: 1070039166703
Al Baraka Islamic Bank, Pakistan, Islamabad	36-80-0-00116
Al Baraka Islamic Bank, Pakistan, Islamabad	36-62-1-00155
Al Baraka Islamic Bank, Pakistan, Islamabad	36-60-0-00116
Al Baraka Islamic Bank, Pakistan, Islamabad	36-60-0-00119
Al Baraka Islamic Bank, Pakistan, Islamabad	36-60-0-00126
Al Faysal Investment Bank	174433
Al Faysal Investment Bank	113-202911-242
Al Faysal Investment Bank, Karachi	100158

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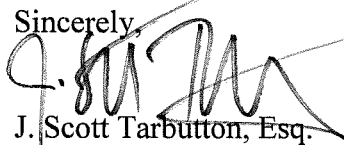
Al Faysal Investment Bank, Pakistan	113-2029111-010
Al Faysal Investment Bank, Pakistan	113-2029111-101
Al Faysal Investment Bank, Pakistan	113-2034840-149
Al Faysal Investment Bank, Pakistan	701-2002566-026
Al Faysal Investment Bank, Pakistan	701-3000230-040
Askari Commercial Bank, Peshawar	101007858
Emirates Bank International, Pakistan	1155-478000-092
Emirates Bank International, Pakistan	1155-478000-001
Emirates Bank International, Pakistan	1155-479189-001
Emirates Bank International, Pakistan (frozen 09/13/2001)	1166-577826-001
Emirates Bank International, Pakistan	1155-478000-008
Habib Bank, Pakistan	391586
Habib Bank, Pakistan	391662
Habib Bank, Pakistan	391667
Habib Bank, Pakistan	1101-95
Habib Bank, Pakistan	1189-99
Habib Bank, Pakistan Islamabad, Corporate Branch Blue Area	1159-51
Habib Bank, Pakistan Peshawar	4072-23
Habib Bank, Pakistan Peshawar	2767-70
Habib Bank, Pakistan Peshawar	1101-95
Habib Bank, Pakistan Peshawar	1189-99
Habib Bank, Pakistan Manshera	2867-84
Habib Bank, Pakistan Islamabad	1174-17
Habib Bank, Pakistan Islamabad, Corporate Branch Blue Area	1166-07
Habib Bank, Pakistan Islamabad, Corporate Branch Blue Area	350036-75
Habib Bank, Pakistan Islamabad, Corporate Branch Blue Area	944-14
Habib Bank, Pakistan Islamabad, Federal Board Branch	2211-000-30056-003
Habib Bank, Pakistan Quetta	1821-62
Habib Bank, Pakistan Quetta	14393-70
Habib Bank, Pakistan Quetta	2634-32
Habib Bank, Pakistan Rawalpindi Town Branch	12050005730001
Habib Bank, Pakistan Rawalpindi Town Branch	12050011595103
Habib Bank, Pakistan Rawalpindi Town Branch	12057900168003
Muslim Commercial Bank, Pakistan, Manshera	2932-1
National Bank of Pakistan, Afghanistan	20025-6
National Bank of Pakistan, Afghanistan	10032-1
National Bank of Pakistan, Kabul Branch, Afghanistan	569-5
Standard Chartered Bank, Pakistan (frozen)	0456957-01
United Bank, Pakistan	01014446
Union Bank	6036-448704-053
Union Bank	6036-448704-090
Union Bank	6036-448704-001

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Sincerely,

A handwritten signature in black ink, appearing to read 'J. Scott Tarbutton', with a long horizontal flourish extending to the right.

J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

JST

cc: Members of Plaintiffs' Executive Committees (via E-Mail)
Eric L. Lewis, Esq. (via E-Mail)
Waleed Nassar, Esq. (via E-Mail)

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